



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAN-EUGEN BOAR,
aka "Rajko Balazs,"
aka "Petr Kucera,"
ATTILA RAVASZ,
ANDREI-RAUL CIRILESCU,
aka "Jan Sitov," and
RADU-MARIAN MOLDOVAN,

Defendants.

CR 2:22-cr-00240-FMO

I N D I C T M E N T

[18 U.S.C. § 1349: Conspiracy to
Commit Bank Fraud; 18 U.S.C.
§ 1028A(a)(1): Aggravated Identity
Theft; 18 U.S.C. § 1546(a):
Passport Fraud; 18 U.S.C. § 982:
Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1349]

[ALL DEFENDANTS]

A. OBJECT OF THE CONSPIRACY

Beginning on an unknown date, and continuing through at least
May 4, 2022, in Los Angeles County, within the Central District of
California, and elsewhere, defendants DAN-EUGEN BOAR,
also known as ("aka") "Rajko Balazs," aka "Petr Kucera," ATTILA

1 RAVASZ, ANDREI-RAUL CIRILESCU, aka "Jan Sitov," and RADU-MARIAN
2 MOLDOVAN ("Defendants"), and others, conspired to commit bank fraud,
3 in violation of Title 18, United States Code, Section 1344.

4 B. MANNER AND MEANS OF THE CONSPIRACY

5 The object of the conspiracy was carried out, and to be carried
6 out, in substance, as follows:

7 1. Defendants and their co-conspirators would secretly install
8 skimming devices in ATMs to record the account information of bank
9 customers, and would then counterfeit debit and credit cards bearing
10 that information.

11 2. Defendants and their co-conspirators would use the
12 counterfeit cards to withdraw funds in the names of those victims of
13 identity theft, and would share the proceeds and send them abroad.

14 3. Federally-insured financial institutions defrauded as a
15 result of this conspiracy include Wells Fargo, Bank of America,
16 Golden 1 Credit Union, Provident Bank, Kinecta Federal Credit Union,
17 EBT Cards, JP Morgan Chase, Navy Federal Credit Union, Patelco Credit
18 Union, Comerica Bank, Regions Bank, PNC Bank, Bay First Bank, Sunrise
19 Bank, Bancorp, Capital One, Keypoint Credit Union, Bank of the West,
20 BBVA, and US Bank.

COUNT TWO

[18 U.S.C. § 1028A(a)(1)]

[ALL DEFENDANTS]

Beginning on an unknown date, and continuing through at least May 4, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendants DAN-EUGEN BOAR, also known as ("aka") "Rajko Balazs," aka "Petr Kucera," ATTILA RAVASZ, ANDREI-RAUL CIRILESCU, aka "Jan Sitov," and RADU-MARIAN MOLDOVAN knowingly possessed, without lawful authority, a means of identification of another person, specifically, the names, account numbers, and PINs of approximately 1,400 victims whose stolen information was recovered during the search on or about May 4, 2022, during and in relation to a felony violation of Title 18, United States Code, Section 1349, Conspiracy to Commit Bank Fraud, as charged in Count One of this Indictment, knowing that the means of identification belonged to another actual person.

COUNT THREE

[18 U.S.C. § 1546(a)]

[DEFENDANT BOAR]

Beginning on an unknown date, and continuing through May 4, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant DAN-EUGEN BOAR, also known as ("aka") "Rajko Balazs," aka "Petr Kucera," knowingly possessed a document prescribed by statute and regulation for entry into the United States, that is, a Czech Republic passport in the name "Petr Kucera," which defendant BOAR knew to be forged, counterfeited, altered, and falsely made.

COUNT FOUR

[18 U.S.C. § 1546(a)]

[DEFENDANT CIRILESCU]

Beginning on an unknown date, and continuing through at least December 20, 2021, in Los Angeles County, within the Central District of California, and elsewhere, defendant ANDREI-RAUL CIRILESCU, also known as "Jan Sitov," knowingly possessed a document prescribed by statute and regulation for entry into the United States, that is, a Czech Republic passport in the name "Jan Sitov," which defendant CIRILESCU knew to be forged, counterfeited, altered, and falsely made.

FORFEITURE ALLEGATION

[18 U.S.C. § 982]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(2), in the event of any defendant's conviction of the offenses set forth in either of Counts One and Two of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), either defendant so convicted shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a third party;

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(c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

A TRUE BILL

/S/

Foreperson

TRACY L. WILKISON
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SCOTT M. GARRINGER
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KRISTEN A. WILLIAMS
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